



Modern Slavery and Human Trafficking Statement

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the calendar year 2024. Clifford Watts Limited has a zero-tolerance approach to modern slavery and we are fully committed to preventing slavery and human trafficking in our operations

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This document is issued by the Compliance Department of:

Clifford Watts Limited
11 Coopers Yard, Curran Road, Cardiff, CF10 5NB

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Version Control

Versions	Author	Date	Approved
V1021	Kevin Still	20/10/2021	Melanie Giles
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1. Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the calendar year 2024. Clifford Watts Limited has a zero-tolerance approach to modern slavery and we are fully committed to preventing slavery and human trafficking in our operations.

The statement sets down our commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is minimal risk of slavery or human trafficking in our supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Our supplier selection and on-boarding procedure includes due diligence of the supplier's reputation, respect for the law, compliance with health, safety and environmental standards, and appropriate references.

Transparency in the supply chain:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency in Supply Chains A Practical Guide 2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/649906/Transparency_in_Supply_Chains_A_Practical_Guide_2017.pdf)

2. Organisational structure and supply chains

This statement covers our business activities of providing:

- regulated debt counselling, debt adjusting and credit information services
- IVA administration as Nominee and Supervisor
- Acting as a Continuing Money Adviser (CMA) under DAS/DPP
- Other project management services, L & D compliance support services.

We currently operate in the following countries:

- England, Northern Ireland, Scotland and Wales

Clifford Watts has identified no high-risk activities in respect of Modern Slavery. Its supply chain is reliance short with limited reliance on any key suppliers. All suppliers are UK based.

On 23 February 2021, the Home Office launched a new registry service¹ on the government site that allows organisations to publish their statements for public viewing. Any firm can use this service, including those who do not currently need to produce a statement, like Clifford Watts. This is voluntary for now. We have registered on this site.

<https://www.gov.uk/government/collections/modern-slavery>

¹ <https://www.gov.uk/guidance/add-your-modern-slavery-statement-to-the-statement-registry>

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In the past financial year, we have conducted a risk assessment of our supply chain by taking into account:

- The risk profile of individual countries we operate in, regarded as low risk
- The business support services rendered by our suppliers
- The presence of vulnerable demographic groups aligned to our vulnerable customer policy and conduct risk framework
- Market research and any insights of labour and human rights groups

These assessments will determine our future response and the ongoing risk controls that we implement.

Responsibility for our anti-slavery initiatives is as follows:

- Kevin Still, Director, is responsible for creating and reviewing policies. The process by which policies are developed is adapting best practice at a proportionate level and reviewing policy at least annually
- Kevin Still is also responsible for risk assessments in respect of human rights and modern slavery by a desktop process looking at potential supply chain risks, including due diligence around supplier Social Value policies
- Kevin Still is also responsible for due diligence in relation to known or suspected instances of modern slavery and human trafficking
- The statement is signed off by Melanie Giles, Director

3. Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, we require all associates to complete free online training² once a year. Border Force offer 2 free e-learning courses on modern slavery and human trafficking that are used by Clifford Watts.

4. Policies

Clifford Watts is committed to ensuring that there is no risk of modern slavery or human trafficking in our business or minimal risk in our supply chain.

This Statement affirms our intention to act ethically in our business relationships.

² <https://www.gov.uk/government/publications/modern-slavery-training-resource-page/modern-slavery-training-resource-page>

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The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations:

- **Whistleblowing policy** - we encourage all employees, associates, customers and other business partners to report any concerns related to its direct activities or its supply chains.
- **Corporate Social Responsibility (CSR) Policy** – our CSR policy summarises how we manage our environmental impacts and how we work responsibly with suppliers and local communities.

5. Due Diligence Processes for Slavery and Human Trafficking

We undertake due diligence when considering taking on new suppliers, and annually review our existing suppliers. Our due diligence process includes building long-standing relationships and making clear our expectations of business partners. For firms that are required to provide a statement then we will review these online.

6. KPIs

We use several KPIs to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains, including annual refresher training and annual due diligence checks on key suppliers.

This Modern Slavery and Human Trafficking Statement will be reviewed annually and updated as necessary. The directors of Clifford Watts endorse this policy statement and is fully committed to its implementation.

This Modern Slavery and Human Trafficking Statement has been approved by:

Name: Kevin Still

Position: Director

Date: 31/12/2024

Signature:

A handwritten signature in blue ink, appearing to read 'Kevin Still', written over a faint, light blue circular stamp.

Modern Slavery and Human Trafficking Statement



An *enlightened* approach to managing your money



Kevin Still
Director

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Clifford Watts Limited is registered in England & Wales with Registration No. 8204102

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RAISING STANDARDS
INSOLVENCY MEMBER